



THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, NY 10007

JAMES E. JOHNSON
Corporation Counsel

DAVID S. THAYER
Assistant Corporation Counsel
t: (212) 356-2649
f: (212) 256-1148
e: dthayer@law.nyc.gov

January 21, 2021

The Honorable Vernon S. Broderick
United States District Court for the
Southern District of New York
40 Foley Square
New York, NY 10007

APPLICATION GRANTED
SO ORDERED *Vern Bro*
VERNON S. BRODERICK
U.S.D.J. 1/22/2021

Re: **W.R. v. N.Y.C. Dep't of Educ.**, Case No. 20 CV 7552 (VSB)

Dear Judge Broderick:

I am an Assistant Corporation Counsel in the Office of the Corporation Counsel of the City of New York, James E. Johnson, attorney for the Defendant New York City Department of Education ("DOE") in the above-referenced action. I write to respectfully request, with the consent of Plaintiffs' counsel, a brief one-week extension of the parties' time to file a joint letter and proposed case management plan and scheduling order in this action under the Individuals with Disabilities Education Act.

The requested extension is necessary because the parties' counsel have not yet had an opportunity to discuss the matters to be included in the joint letter and proposed case management plan, due in part to a calendaring error that resulted in my believing that the deadline for submission of these documents was next week. I apologize for my mistake. Given this error, I request a brief extension of time of the parties' deadline so that I may speak with Plaintiffs' counsel and we may jointly prepare the documents described in the Court's order and notice of initial conference. (ECF No. 13.)

This is the DOE's first request for an extension of time by which the parties must file their joint letter and the proposed case management plan and scheduling order. Plaintiffs' counsel consents to this request.

Thank you for your consideration of this application.

Respectfully yours,

/s/ David S. Thayer

David S. Thayer

cc: ***Via ECF***
Adam Dayan, Esq.
Law Offices of Adam Dayan, PLLC
222 Broadway 19th Floor
New York, NY 10038
Counsel for Plaintiffs